

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA

v.

SASCHA AMADEUS CARLISLE

Defendant

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Case No.: 1:19-CR-57-LO

MOTION TO FOR EXENTION OF TIME TO FILE PRETRIAL MOTIONS

COMES NOW the Defendant, Sascha Amadeus Carlisle, by and through counsel, and respectfully moves this Honorable Court to extend the time for filing pretrial motions. A third superseding indictment was filed in this case on August 29, 2019. A status conference was held on September 11, 2019 and Defendant Carlisle was arraigned on September 18, 2019. A motions hearing was set for November 15, 2019. Trial is set to start on February 10, 2020.

Discovery in this case has been ongoing and began following Defendant's arrest and prior to the filing of the third superseding indictment. It is extremely voluminous and consists of over 100,000 PDF files, video and audios files, photographs, cell phone dumps, social media files, GPDS data and more. In addition, counsel is awaiting an additional discovery disclosure of approximately one terabyte.

Counsel requests additional time to obtain and review discovery prior to drafting and arguing motions.

WHEREFORE, Defendant respectfully requests that the Court grant the foregoing motion in the interests of justice.

Respectfully submitted,

SASCHA AMADEUS CARLISLE
By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November 2019, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

/s/

JEFFREY D. ZIMMERMAN